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July 11, 2011

**BY FAX**

Hon. Harold Baer  
United States District Court  
Southern District of New York  
500 Pearl Street, Chambers 2230  
New York, New York 10007  
Fax: (212) 805-7901

Re: *Maclaren Europe Limited v. ACE American Insurance Company*  
Index No.: 1:11-cv-04688-HB  
Our File No.: 01560-007753

Dear Judge Baer:

This firm represents the defendant, ACE American Insurance Company ("ACE"), in the above-referenced matter currently pending before the Court. The above-referenced matter was removed to this Court on July 7, 2011.

In order to have adequate time to review the claims file associated with this matter and respond to the complaint, plaintiff's counsel previously agreed to an extension of time for ACE to respond to the complaint (see attached stipulation).

Therefore, this request is unopposed and ACE respectfully requests that the Court extend the deadline to respond to plaintiff's complaint from July 14, 2011 to **July 28, 2011**.

Thank you for your consideration.

Very truly yours,

Thomas R. Orofino  
Joseph K. Powers

Sedgwick LLP

cc: Paul S. Hugel, Esq. Fax: (212) 949-8255  
CLAYMAN & ROSENBERG LLP, Attorneys for Plaintiff

NY/718259v1

Amplified granted.  
SO ORDERED  
JES  
7-13-11

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Thomas R. Orofino, Esq.  
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125 Broad Street, 39th Floor  
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(212) 422-0202  
Attorneys for Defendant,  
*ACE American Insurance Company*

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X  
MACLAREN EUROPE LIMITED,

Plaintiff,

Index No. 103134/2011

-against-

**STIPULATION EXTENDING  
TIME TO ANSWER**

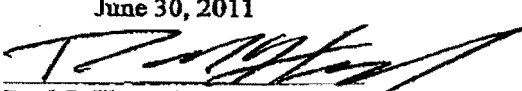
ACE AMERICAN INSURANCE COMPANY, a/k/a  
ACE USA

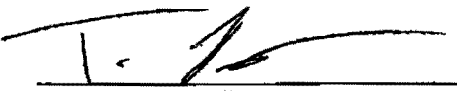
Defendant.  
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IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the respective parties, that the time for Defendant, ACE AMERICAN INSURANCE COMPANY, to appear, answer or move with regard to the Complaint is extended up to and including July 28, 2011.

IT IS FURTHER STIPULATED AND AGREED by and between the parties hereto, that facsimile or .pdf format signatures sent by electronic mail shall be deemed as original.

Dated: New York, New York  
June 30, 2011

  
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